

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Angela Cephas	:	Chapter 13
	:	
Debtor (s)	:	Case No.: 15-11801ELF

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, by and through her undersigned counsel, hereby moves to modify her Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about March 17th, 2015.
2. The Chapter 13 filing was assigned case number 15-11801.
3. On or about August 12th, 2016 Wells Fargo Bank, N.A. as "Movant," filed a Motion for Relief from the Automatic Stay due to the Debtor's failure to make regular and timely mortgage payments post filing.
4. Unbeknownst to the Debtor, the Debtor's property assessment, and real estate taxes had dramatically increased in 2014.
5. This Motion for Relief was additionally withdrawn on January 5th, 2017 and then re-filed in April of this year.
6. The Debtor is in need of this motion due to the fact that she has been attempting to work out the Motion for Relief and has not known her specific monthly mortgage payment to make to the Movant.
7. Debtor's Counsel has worked diligently with Counsel for Movant, and they have come to an agreement in order to resolve the pending the Motion for Relief.
8. In order to settle the Motion for Relief, Debtor shall pay the amount of \$12,470.51 in post-petition arrears through a modified Chapter 13 Plan.

9. This amount will be reflected in a stipulation to settle the pending Motion for Relief.

10. The Debtor through her Counsel has drafted a proposed modified Plan reflecting this settlement. Please see proposed modified Plan marked as **"Exhibit A."**

11. This modified Plan is feasible, and will allow the Debtor to keep her residence and complete her Bankruptcy in good faith.

WHEREFORE, the Debtor requests that she be permitted to modify her Chapter 13 Plan for the above stated reasons.

Dated: October 27, 2017

/s/Brad J. Sadek, Esq
Brad J. Sadek, Esq.
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